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LATHAM & WATKINS LLP

June 10, 2025

VIA ECF

The Honorable Jennifer L. Rochon
 U.S. District Court for the Southern District of New York
 Daniel Patrick Moynihan U.S. Courthouse
 500 Pearl Street, Room 1920
 New York, New York 10007

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Re: *Cengage Learning, Inc. v. Google LLC*, No. 1:24-cv-04274-JLR-BCM
Letter Motion for Extension of Time to File Answer

Dear Judge Rochon:

We represent Defendant Google LLC in the above-captioned matter. We write pursuant to Rule 1.F of Your Honor's Individual Rules of Practice in Civil Cases for an extension of time within which to file Google's answer to Plaintiffs' amended complaint.

The Court entered its opinion granting in part and denying in part Google's motion to dismiss the amended complaint on June 4, 2025. See Dkt. 111. Under Federal Rule of Civil Procedure 12(a)(4)(A), Google's current deadline to answer the amended complaint is June 18, 2025. Google respectfully requests a 14-day extension of time within which to file its answer, to and including July 2, 2025. The extension is necessary to allow Google to adequately prepare its responsive pleading in light of the length and complexity of Plaintiffs' allegations, counsel for Google's competing professional and personal commitments, and the need to coordinate availability with internal Google teams regarding Google's responses.

This is Google's first and only request for an extension of the time to file its answer. The requested extension will not affect any other case deadlines.

Google conferred with counsel for Plaintiffs, who stated that they consent to Google's request. Google includes the following statement at Plaintiffs' request:

Plaintiffs disagree that an extension is necessary. Defendant has had the amended complaint for nearly nine months, and has had the original complaint for over a year. Notwithstanding the dismissal of two claims, nearly all of the factual allegations in the complaint pertain to the remaining two claims. Further, because the deadline for document discovery is August 15, 2025, Defendant's extension leaves little time for the parties to conduct discovery based on Defendant's answer, which Defendant is filing for the first time. As such, Plaintiffs proposed that in the event such discovery is needed, Defendant agree to serve its objections within 15 days, rather than the 30 days allowed under the rules. Unfortunately, Defendant rejected this sensible proposal. Nonetheless, in the spirit of

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compromise, Plaintiffs reluctantly consent to this most recent of Defendant's several extension requests.

Respectfully submitted,

/s/ Sarang Vijay Damle
Sarang Vijay Damle
of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

Google's request for an extension of time to file its answer is GRANTED.
Google shall file its answer by July 2, 2025.

Dated: June 11, 2025

New York, New York

SO ORDERED.

Jennifer Rochon
JENNIEER L. ROCHON
United States District Judge